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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

)  
Amendment to Section 1.773 of the )  
Commission's Rules Regarding )  
Pleading Cycle for Petitions )  
Against Tariff Filings Made on )  
14 Days Notice )

CC Docket No. 92-117

COMMENTS OF  
SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT), by its attorneys, pursuant to Section 1.429(f)<sup>1</sup> of the rules of the Federal Communications Commission (Commission), hereby files its comments on the Petition for Reconsideration (PFR) of MCI Telecommunications Corporation (MCI).<sup>2</sup> SWBT opposes the PFR of MCI since the issue repeated by MCI in its PFR has already been considered and rejected by the Commission.

I. MCI's SOLE ARGUMENT HAS ALREADY BEEN CONSIDERED AND REJECTED BY THE COMMISSION.

MCI claims that its argument, in favor of requiring

Reply Comments in this proceeding. MCI's position is based on its desire to be able to promptly reply to alleged "non-responsive, illogical, unsupported, or otherwise outrageous" Reply Comments before the tariff takes effect.<sup>3</sup>

Nevertheless, it is unnecessary for the Commission to reconsider the Report and Order for the reason given by MCI. Even if the Commission did not actually view MCI's argument, its position had essentially been stated in Reply Comments in this proceeding by Aeronautical Radio, Inc. (ARINC).

The Commission noted in the Report and Order that "ARINC . . . argues that petitioners must have timely service of replies in order to address any inaccuracies made by the carriers."<sup>4</sup> The Report and Order then went on to find that since petitioners cannot file a response, it is unnecessary to require personal service.<sup>5</sup>

Given that MCI's view has already been discussed and rejected by the Commission, it would be redundant and unnecessary for the Commission to deal with this issue once again. Therefore, MCI's petition should be denied.

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<sup>3</sup> MCI PFR at pp. 2-3.

<sup>4</sup> Report and Order, at para. 13.

<sup>5</sup> Id. at para. 18.

II. CONCLUSION

For the foregoing reasons, SWBT respectfully requests that the PFR of MCI be denied.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing  
Comments of Southwestern Bell Telephone Company in CC Docket  
No. 92-117, have been served this 18th day of June, 1993 to  
the Parties of Record.

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